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July 7, 2023

**Via ECF**

Honorable Marcia M. Henry  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Ins. Company, et al. v. Stybel, et al.*  
Case No. 1:22-cv-02834-PKC-MMH  
RR File No.: 005100-03539

Dear Judge Henry:

We represent Plaintiffs in the above-referenced matter. Pursuant to today's telephone status conference, we write to the Court regarding the Affidavit of Service for Motion for Default Judgment served on New York Billing and Processing Corp. ("NYBP") that was filed with the Court on June 29, 2023 (the "Affidavit of Service", See ECF 62). A copy of the Affidavit of Service is attached as Exhibit "1".

As part of Plaintiffs' Motion for Default Judgment filed on June 5, 2023 (See ECF 59), Plaintiffs attempted to serve NYBP with a copy of the motion via certified mail at 1829 E 13 Street, Suite 1-A, Brooklyn, New York 11229, which is NYBP's listed address with the New York State Department of State Division of Corporations. However, the motion papers were returned to Rivkin Radler LLP as undeliverable. Pursuant to Local Rule 55.2(c), Plaintiffs then served NYBP with a copy of the motion via certified mail at 3063 Brighton 8<sup>th</sup> Street, Second Floor, Brooklyn, New York 11234, which, based on the evidence in this case and bills submitted by Defendant Elena Borisovna Stybel, M.D. (A Sole Proprietorship), is the office location from which NYBP operated.

Plaintiffs' respectfully request that the Court consider the Affidavit of Service as part of Plaintiffs' Motion for Default Judgment filed on June 5, 2023 as further evidence of Plaintiffs' effort to promote fairness and efficiency in notifying NYBP under Local Rule 55.2(c).

We thank the Court for its time and continuing attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

*/s/ Garin Scollan*

Garin Scollan

Encl.

Cc: All counsel of record (*via* ECF)